

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**In Re: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document Relates to:**

*Brock Donnelly v. 3M Company et al.*, No. 2:20-cv-00209-RMG

*Clinton Speers & Gail Speers v. 3M Company et al.*, No. 2:21-cv-03181-RMG

*Kevin Voelker v. 3M Company et al.*, No. 2:18-cv-03438-RMG

**DEFENDANTS' FIRST OMNIBUS MOTION TO EXCLUDE  
PLAINTIFFS' CAUSATION AND PLAUSIBILITY EXPERT TESTIMONY**

Pursuant to Federal Rules of Evidence 702 and Case Management Order Nos. 26-G and 26-J, Defendants' Co-Lead Counsel, on behalf of the *PI Bellwether* Defendants, submit this first omnibus motion to exclude testimony from Dr. Joseph M. Braun, Dr. Robert Bahnson, and Dr. David H. Sherman. As set forth in the accompanying memorandum of law, these experts' opinions do not satisfy the standards for the admission of expert testimony.

Dated: June 17, 2025

Respectfully submitted,

/s/ Brian Duffy

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*Defense Co-Leads*

**CERTIFICATE OF SERVICE**

On June 17, 2025, I electronically submitted the foregoing document with the Clerk of Court, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian Duffy  
Brian Duffy